

# ARTER & HADDEN<sup>LLP</sup>

ATTORNEYS AT LAW

*Founded 1843*

One Columbus

10 West Broad Street, Suite 2100

Columbus, Ohio 43215-3422

telephone 614.221.3155

facsimile 614.221.0479

September 8, 1998

San Diego

San Francisco

Washington, D.C.

Woodland Hills

*Affiliated Offices*

Brussels, Belgium

Geneva, Switzerland

Direct Dial: (614) 229-3277  
Email: [dgrant@arterhadden.com](mailto:dgrant@arterhadden.com)

Austin  
Cleveland  
Columbus  
Dallas  
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SEP 11 2 04 PM '98

Debbie A. Manzano  
Senior Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

Re: COO316455/You letter of September 2, 1998 regarding amended June '97  
monthly report dated 8/20/97

Dear Ms. Manzano:

The undersigned represents the Ohio Gun Collectors Association and its Separate Segregated Fund known as the Ohio Gun Collector Association Political Action Committee (COO316455). In reference to your letter of September 2, 1998, we will make the corrections requested in the first, second and eighth paragraphs and will have Mr. Snyder execute such amended report.

Regarding the contribution of auction items by the Ohio Gun Collectors Association, a membership organization under Ohio law and connected organization under 2 USC § 431(7), we believe such contributions are permissible under 2 USC § 441(b)(2)(C) and 11 CFR § 114.5(b)(2). Note that in the year in question the connected organization contributed auction items valued at \$2,225 and the PAC raised \$10,468.50. No portion of this amount is reimbursable to the connected organization under the one-third rule of 11 CFR 114.5(b)(2). See Federal Election Commission Advisory Opinion AO 1195-17 at fn. 6.

Finally, we note the request that Mr. Snyder personally sign each report. Mr. Snyder travels frequently and often is unavailable to execute the report in time to make the 20<sup>th</sup> of the month deadline. (We once mailed a report on the 21<sup>st</sup> as the 20<sup>th</sup> fell on a Sunday and the post office was closed. We assumed FEC report filers would receive the same consideration IRS form filers receive when the post office is closed, but we got an unbelievable hassle over that incident -- from the Ohio Secretary of State's office, I believe. Consequently, we now always mail the report on or before the 20<sup>th</sup> of the month even if Mr. Snyder has to act through an authorized representative.)

## ARTER & HADDEN LLP

Debbie A. Manzano

September 8, 1998

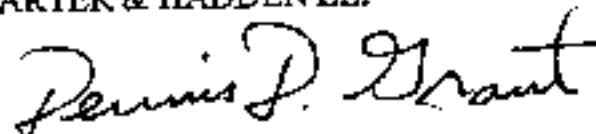
Page 2

Under Ohio law [R.C. 1303.39(A)], a signature may be made by an agent or other representative and his authority to make it may be established as in other cases of representation. No particular form of appointment is necessary to establish such authority. Mr. Snyder understands he remains personally responsible for the timely and complete filing of the report and for the accuracy of any information contained in it even though I, with his authorization, may sign his name to it. If the Commission would like a separate letter from Mr. Snyder verifying such authorization or if it has any attorney-in-fact form similar to those used by the IRS which it prefers, please advise.

We are appreciative of your advice (in other letters of the same date) that Receipt and Disbursement schedules with no activity may be omitted. Presumptively, you are endeavoring to eliminate unnecessary paper and the handling thereof. If the Commission will not accept signature by Mr. Snyder's authorized representative or designee, the only practical solution for this PAC might be to file on a timely basis each month using proxy signatures, and then amend the report the following month simply to add Mr. Snyder's hand signed name. This, of course, would occur only where Mr. Snyder's travel schedule makes him unavailable during the timeframe immediately preceding the filing date but still, in our opinion, would constitute the filing and governmental handling of wholly unnecessary and duplicative paperwork. Please advise as to whether appropriate power of attorney forms are available through your office and, if so, please forward one.

Sincerely,

ARTER & HADDEN LLP



Dennis D. Grant

cc: J. Snyder

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE  
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

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